

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA**

|                          |           |                     |
|--------------------------|-----------|---------------------|
| UNITED STATES OF AMERICA | *         | CRIMINAL NO. 09-282 |
| v.                       | *         | SECTION: "R"        |
| MECHELLE TURNER          | *         |                     |
|                          | *   *   * |                     |

**FACTUAL BASIS**

Should this matter have gone to trial, the Government would have proved beyond a reasonable doubt, through the introduction of competent testimony and admissible tangible exhibits including the testimony of special agents of the Federal Bureau of Investigation ("FBI"), employees of the American Red Cross ("Red Cross") and others, the following facts to support the allegations charged by the United States Attorney in the Bill of Information now pending against the defendant, Mechelle Turner.

An employee of the Red Cross would testify that in the weeks and months after Hurricane Katrina, which struck southeastern Louisiana on August 29, 2005, the Red Cross maintained disaster recovery centers to assist victims of Hurricane Katrina. Through these recovery assistance efforts, the Red Cross provided financial assistance to residents displaced or otherwise affected by Hurricane Katrina. People affected by the storms were able to apply for a one-time only financial grant of up to \$1,565 from the Red Cross. In order to receive these funds, applicants needed to present

identification to a Red Cross representative that indicated residence in an affected zone. Applicants were also required to swear and attest that they had not received any undisclosed additional American Red Cross financial assistance at any other Red Cross assistance location.

Competent testimony would be introduced that once approved, the Red Cross made these disaster assistance funds available in one of four ways: (1) A personal check made payable to the applicant, issued on-site, and cashed with the assistance of the Red Cross; (2) A Red Cross-issued “Discover” card, issued on-site, and activated via phone by the applicant; (3) A Red Cross-issued Client Assistance Card, issued on-site, and purchased by the Red Cross from private banking institutions; (4) A personal check authorized by the Red Cross, issued by Paychex, Inc.

Testimony by an employee of the Red Cross and admissible exhibits would be introduced to prove that the defendant, Mechelle Turner, presented herself to Red Cross assistance centers on approximately ten (10) occasions between September 21, 2005 and October 23, 2005. During these visits she applied for financial assistance and indicated that she had not received any other funds from the Red Cross on prior occasions, even though she had received prior Red Cross assistance. As a result of her actions in connection with these applications, Mechelle Turner received direct financial assistance from the Red Cross totaling \$12,530, of which \$10,965 was obtained by fraud. Competent testimony and admissible exhibits would be introduced to prove that on one of the subsequent occasions Mechelle Turner fraudulently applied for assistance, that is, on or about October 2, 2005, she received a pre-loaded Capital One Visa debit/gift card from the Red Cross at an assistance center located in Metairie, Louisiana, within the Eastern District of Louisiana.

An employee of Capital One would testify, and admissible records from Capital One and Wal-Mart, Inc. would be submitted to prove that on or about October 2, 2005, in the Eastern District

of Louisiana, a pre-loaded Capital One debit/gift card, numbered XXXX-XXXX-XXXX-5276, issued by the Red Cross to Mechelle Turner on the same day of October 2, 2005, was used by the defendant at a Wal-Mart Super Center in Hammond, Louisiana. This use in turn caused certain writings, signs, signals, and sounds to be sent from the point of use in Hammond, Louisiana to a data center outside the state of Louisiana, authorizing and allowing items to be purchased at the Wal-Mart Super Center in Hammond, Louisiana.

**READ AND APPROVED:**

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GEORGE CHANEY  
Assistant Federal Public Defender

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PETER M. THOMSON  
Assistant U.S. Attorney

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MECHELLE TURNER  
Defendant